

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed February 9, 2005. Applicants appreciate the Examiner's consideration of the Application. Claims 1, 14-17, 26, 30, 44, and 46 have been amended. Certain amendments do not narrow the scope of the claims, and certain amendments are not required for patentability. Applicants respectfully submit that no new matter has been added by the amendments to the specification or by the amendments to the claims. In order to advance prosecution of this Application, Applicants have responded to each notation by the Examiner. Applicants respectfully request reconsideration and favorable action in this case.

Specification

The Specification is amended in accordance with the requirement of the Examiner to correct informalities. Applicants thank the Examiner for pointing out the informalities.

Section 102 Rejection

The Examiner rejects Claims 1-50 under 35 U.S.C. § 102(b) as being unpatentable over U.S. Patent No. 6,535,518 to Hu et al. ("*Hu*"). Applicants respectfully traverse this rejection for the reasons discussed below.

Applicants respectfully submit that *Hu* fails to disclose, or even teach or suggest, the elements specifically recited in Applicants' amended claims. For example, *Hu* fails to disclose, teach, or suggest the combination of elements specifically recited Claim 1, as amended:

- (1) identify a first communication protocol of an incoming packet, the incoming packet destined for a destination port associated with a second communication protocol;
- (2) determine if the first communication protocol matches the second communication protocol;
- (3) determine if the first communication protocol and the second communication protocol have a common layer if the first communication protocol does not match the second communication protocol; and
- (4) encapsulate the incoming packet in the second communication protocol if the first communication protocol and the second communication protocol have a common layer.

Hu discloses a switching element that performs protocol conversion. According to *Hu*:

There are several formats with respect to different interfaces and layers of protocols. These decodings and conversions have to be done in the device and involve multiple protocol layers. Examples of decoding and format conversions are HTTP, RTSP, ftp, IP/TCP/UDP, Ethernet, SCSI, Fibre Channel, and/or PCI interfaces.

(Column 8, lines 2-7; see also, column 6, lines 24-27, column 8, lines 57-58, column 10, lines 34-37.) *Hu*, however, does not disclose the details of such protocol conversion. Accordingly, *Hu* fails to disclose, teach, or suggest “identify a first communication protocol of an incoming packet, the incoming packet destined for a destination port associated with a second communication protocol,” “determine if the first communication protocol matches the second communication protocol,” “determine if the first communication protocol and the second communication protocol have a common layer if the first communication protocol does not match the second communication protocol,” and “encapsulate the incoming packet in the second communication protocol if the first communication protocol and the second communication protocol have a common layer,” recited in amended independent Claim 1.

The dependent claims are allowable based on their dependence on the independent claim and further because they recite numerous additional patentable distinctions over the reference of the rejection. Because Applicants believe they have amply demonstrated the allowability of the independent claim over the reference of the rejection, and to avoid burdening the record, Applicants have not provided detailed remarks concerning these dependent claims. Applicants, however, remain ready to provide such remarks if it becomes appropriate to do so.

Independent Claims 14-17, 26, 30, 44, and 46 recite certain limitations substantially similar to those recited in independent Claim 1. Accordingly, for at least the same reasons, Applicants also respectfully request reconsideration and allowance of independent Claims 14-17, 26, 30, 44, and 46 and all claims that depend on these claims.

CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all the pending claims.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Keiko Ichiye, the Attorney for Applicants, at the Examiner's convenience at (214) 953-6494.

Although Applicants believe no fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

BAKER BOTTS L.L.P.
Attorneys for Applicants



Keiko Ichiye
Reg. No. 45,460

KI/ls

Correspondence Address:

Baker Botts L.L.P.
2001 Ross Avenue, Suite 600
Dallas, Texas 75201-2980
(214) 953-6494

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Customer Number: 05073